

Lauren Simon Irwin

From: Brown, Jennifer [Jennifer.Brown@wilmerhale.com]
Sent: Monday, August 05, 2013 3:04 PM
To: Lauren Simon Irwin
Cc: Heather M. Burns; Rosenfeld, Jonathan
Subject: Ameen v. Amphenol

Hi Lauren,

I write in response to your letters dated July 19 and July 29.

Regarding your July 19 letter, we do not agree to the stipulation that you propose. It continues to be our position that the cell phone records should have been produced long ago, and a stipulation is only acceptable if it is consistent with the deposition testimony that Mr. Connors gave (as we outlined in our letter dated July 3). Since it appears you will not agree to such a stipulation, we would like to schedule a meet and confer call with you on this issue for this week or next week. Please let us know when you are available for such a call.

Regarding your July 29 letter, we stand by the objections stated in our responses to the Requests for Production. The requested documents will not be produced.

Thanks,

Jenn

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